

COMMONWEALTH OF MASSACHUSETTS
UNITED STATES DISTRICT COURT

CIVIL ACTION NO.: 04-11800DPW

ADAM HELFAND, CARON HELFAND,)
AND MITCHELL HELFAND,)
Plaintiffs)
)
v.)
)
THE JOHN DEWEY ACADEMY, INC.,)
THOMAS BRATTER, CAROLE BRATTER,)
KEN STEINER, AND GWENDOLYN)
HAMPTON,)
Defendants)
)

**ASSENTED-TO MOTION TO EXTEND THE TIME FOR FILING AN
OPPOSITION TO DEFENDANTS, THE JOHN DEWEY ACADEMY, INC.,
THOMAS BRATTER, CAROLE BRATTER, AND KEN STEINER, MOTION FOR
SUMMARY JUDGMENT**

The Plaintiffs request that the Court grant additional time for them to respond to the Defendants, The John Dewey Academy, Inc., Thomas Bratter, Carole Bratter, and Ken Steiner's Motion for Summary Judgment. As grounds therefore, the Plaintiffs state:

1. Defendants, The John Dewey Academy, Inc., Thomas Bratter, Carole Bratter, and Ken Steiner filed a Motion for Summary Judgment on July 31, 2006. Due to a previously scheduled mediation on August 14, 2006, the Court allowed the Plaintiffs up to and including August 28, 2006 in which to file their response.
2. Subsequent to the Court's allowance of that motion, the mediation was rescheduled due to a scheduling conflict on the part of the Defendants' insurance adjustor.
3. The mediation is currently scheduled for September 7, 2006.

3. The Plaintiffs now seek additional time to file an opposition to the Motion for Summary Judgment should mediation efforts fail.

WHEREFORE, the Plaintiffs request that the time to file their opposition to the Defendants' Motion for Summary Judgment be extended an additional fourteen days beyond the date of the scheduled mediation, or **September 21, 2006**.

Respectfully submitted,
The Plaintiffs,
Adam Helfand, Caron Helfand, and Mitchell
Helfand,
By their attorneys,

/s/ Djuna E. Perkins
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DATED: August 25, 2006

Assented to by:

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